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JUN 30 2004

June 30, 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

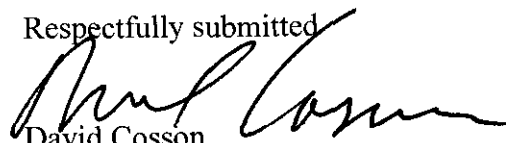
RE: Petition of CTC Telcom, Inc. for Redefinition of the Service  
Area of CenturyTel of the Midwest - Wisconsin

Dear Ms. Dortch:

Attached please find an original and four copies of the Petition of CTC Telcom, Inc. for Redefinition of the Service Area of CenturyTel of the Midwest - Wisconsin.

Please acknowledge receipt on the "stamp and return" duplicate document attached for this purpose. All correspondence and inquiries concerning this filing should be addressed to the undersigned.

Respectfully submitted

  
David Cosson  
Counsel for CTC Telcom, Inc.

cc: Thomas Buckley  
Anita Cheng

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JUN 30 2004

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Federal-State Joint Board on ) CC Docket No. 96-45  
Universal Service )  
 )  
Petition of CTC Telcom, Inc. for )  
Redefinition of the Service Area of )  
CenturyTel of the Midwest - Wisconsin )

**PETITION OF CTC TELCOM, INC. FOR REDEFINITION OF THE SERVICE AREA  
OF CENTURYTEL OF THE MIDWEST - WISCONSIN**

Pursuant to Section 214(e)(5) of the Communications Act of 1934, as amended, and Section 54.207(c) of the Commission's Rules,<sup>1</sup> CTC Telcom, Inc. ("CTC") respectfully requests that the Commission approve the Decision of the Public Service Commission of Wisconsin ("PSC") to establish a service area less than the incumbent's study area when it designated CTC as an Eligible Telecommunications Carrier ("ETC") in the Chetek exchange of CenturyTel of the Midwest - Wisconsin ("Century").<sup>2</sup> CTC is a facilities-based Competitive Local Exchange Carrier ("CLEC") that serves approximately 8000 subscribers in the Wisconsin communities of

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<sup>1</sup> 47 U.S.C. § 214(e)(5); 47 C.F.R. § 54.207(c).

<sup>2</sup> *Application of CTC Telcom, Inc., for Designation as an Eligible Telecommunications Carrier in Wisconsin*, Docket No. 1455-TI-101, Final Decision ("Decision") March 18, 2004. A copy of the Decision is attached as Appendix A.

Barron, Rice Lake and Chetek, Wisconsin.<sup>3</sup> CTC is a wholly owned subsidiary of Chibardun Telephone Cooperative.<sup>4</sup> Century is an Incumbent Local Exchange Carrier ("ILEC") which offers service in Chetek, and 49 other exchanges in its Study Area with a total of approximately 140,000 access lines. Century is considered a Rural Telephone Company ("RTC").<sup>5</sup>

## **I BACKGROUND**

CTC filed an application for ETC status in the Chetek exchange with the PSC on December 31, 2002. The PSC considered the application at a meeting on February 26, 2004 and released its Decision approving the application on March 22, 2004. This designation was, however, subject to the condition that the Federal Communications Commission approve, pursuant to Section 54.207(c), the use of a service area smaller than Century's entire study area.

The PSC concluded that ETC designation of CTC is in the public interest because it "will provide additional competition in that exchange, and will provide benefits including customer choice, downward pressure on prices, and additional infrastructure development."<sup>6</sup> The PSC also found that CTC "has fulfilled the state and federal rules for essential service provision and ETC status" in its other exchanges for several years. The PSC concluded therefore that any

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<sup>3</sup> CTC's Barron and Rice Lake, Wisconsin competitive operations are in exchanges assigned to a different Century study area.

<sup>4</sup> Chibardun is an Incumbent Local Exchange Carrier that serves approximately 6700 access lines in six exchanges adjacent to CTC's service area.

<sup>5</sup> Century's Wisconsin operations include at least 16 study areas, with over 455,000 access lines. Universal Service Administrative Company, Second Quarter 2004, High Cost Loop support Projected by State by Study Area, Appendix HC05, pp. 32-34.

<sup>6</sup> Decision at 4.

additional federal USF dollars “will be spent exactly as intended—in this case to promote competition and infrastructure deployment in rural areas.”<sup>7</sup>

As in its other CLEC exchanges, CTC has brought specific benefits to rural consumers in Chetek by deploying a “state of the art” fiber to the curb network which provides broadband service with speeds up to 52 MBPS. Broadband Internet, digital video, voice mail, custom calling features and CLASS features are just a few of the services offered in addition to the traditional local and long distance telephone service.

The PSC also found specifically that CTC should be designated, subject to FCC approval, for a service area encompassing the Chetek exchange which constitutes less than the entire Century Study Area. The PSC noted that there was no reason to believe that CTC was attempting to receive high-cost support for serving a low cost area, but rather recognized that CTC entered the Chetek exchange because it is adjacent to its existing operating areas. The PSC also noted that Century has an opportunity, which it has so far not taken, to disaggregate its USF support.<sup>8</sup> Finally, the PSC recognized that the Chetek exchange “is completely noncontiguous with any other exchange in CenturyTel’s service territory,” a condition which this Commission has recognized as an important factor in determining whether to designate a service area as less than an ILEC’s study area.<sup>9</sup>

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<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 6.

<sup>9</sup> *Id.* at 7. See, *Federal State Joint Board on Universal Service*, First Report and Order, 12 FCC Rcd 8776, 8881-82 (1967)

## **II APPROVAL OF THE SERVICE AREA SPECIFIED BY THE WISCONSIN COMMISSION WILL BE CONSISTENT WITH THE PUBLIC INTEREST AND THE COMMISSION'S RULES**

Section 54.207(c) of the Commission's Rules requires that a petition seeking the Commission's agreement to redefinition of the service area of a Rural Telephone Company must contain the definition proposed by the state commission and the state commission's ruling, including any analysis of any relevant Federal-State Joint Board recommendations.<sup>10</sup> As indicated above, the proposed service area is the Chetek exchange of Century, and the PSC's decision is attached.

The PSC's Final Decision focuses on the Joint Board's concern with the possibility that a service area less than the study area of a Rural Telephone Company could be designed to "cherry pick" or "cream skim" the lower cost to serve areas of the ILEC, while taking advantage of universal service support based upon a higher study area average cost. First, the PSC found that CTC chose to enter the Chetek exchange because it is adjacent to the areas in which it was already offering service, and that if there were any "cream skimming" concerns, Century retains the ability to request disaggregation of its support. The PSC's findings are correct. As illustrated by the attached map,<sup>11</sup> CTC has successfully operated its facilities-based CLEC business by pursuing an "edge out" strategy maximizing the potential efficiency gains by

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<sup>10</sup> 47 C.F.R. 54.207(c)(1).

<sup>11</sup> Appendix B

remaining close enough to its parent, Chibardun, to realize economies of scale and scope.

Chetek was a logical geographic location to implement this strategy.

Second, there is, in any event, little cream to "skim" in Chetek. According to data in the PSC's files, the Chetek exchange has a density of 8.7 lines per square mile, compared to a study area average of 25.2, and the four largest exchanges have densities of 201, 60, 60 and 53 lines per square mile respectively.<sup>12</sup> Thus it appears that if Century were to disaggregate its study area, the per line support in Chetek would more likely increase rather than decrease.

The PSC decision is also consistent with the Joint Board's concerns that it consider the unique status of Rural Telephone Companies and that definition of the Chetek exchange as the service area with respect to CTC's obligations as an ETC is not unduly burdensome. The Commission has previously recognized that no additional burden is created on the ILEC by such designations.<sup>13</sup> Finally, the decision recognizes the concerns of the Joint Board and the Commission that separate service areas are more likely to be required when, as here, the study area of the ILEC is discontinuous.<sup>14</sup>

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<sup>12</sup> The PSC data is attached as Appendix C. *See, Highland Cellular, Inc., Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, FCC 04-37, CC Doc. No. 96-45, April 12, 2004, para. 26.

<sup>13</sup> *RCC Holdings, Inc. Petition for Designation as an Eligible Telecommunications Carrier Throughout its Licensed Service Area in the State of Alabama*, 17 FCC Rcd 23532, 23548 (WCB 2002).

<sup>14</sup> *See, note 9, supra.*

### III CONCLUSION

The Wisconsin Public Service Commission has designated CTC Telcom, Inc. as an ETC for a service area comprising the Chetek exchange of Century Telephone, subject to the condition that the FCC approve its designation of a service area that is less than Century's study area. The PSC's decision and public interest findings are well founded and consistent with the Commission's rules. CTC therefore respectfully asks this Commission to approve promptly the PSC decision to redefine the service area.

Respectfully submitted



David Cosson  
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Washington, D.C. 20037  
202 296 8890

Counsel to CTC Telcom, Inc.


June 30, 2004

#### Attachments

Verification of Rick Vergin	
Appendix A	Final Decision of Wisconsin Public Service Commission
Appendix B	Map of adjacent exchanges
Appendix C	PSC data re exchanges in Century's Study Area

I, Ricky S. Vergin, Chief Executive Officer of CTC Telcom, have read the foregoing Petition of CTC Telcom, Inc. for Redefinition of the Service Area of CenturyTel of the Midwest - Wisconsin and state that the facts therein are true and correct to the best of my knowledge and belief.

Dated this 23<sup>rd</sup> day of June, 2004

  
\_\_\_\_\_  
Ricky S. Vergin CEO



## **APPENDIX A**

DATE MAILED

MAR 22 2004

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BEFORE THE

PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of CTC Telecom, Inc., for Designation as an Eligible  
Telecommunications Carrier in Wisconsin

1455-TI-101

### FINAL DECISION

This is the final decision in the application of CTC Telecom, Inc., (CTC) for designation as an Eligible Telecommunications Carrier (ETC) at the Chetek exchange pursuant to 47 U.S.C. § 214(e) and Wis. Admin. Code § PSC 160.13.

#### Introduction

On December, 31, 2002, CTC filed an application for designation as an ETC at the Chetek exchange. ETC status makes a carrier eligible for both state and federal universal service funds (USF). The Chetek exchange is served by an incumbent local exchange carrier (ILEC) which is a rural telephone company, CenturyTel of the Midwest – Wisconsin (CenturyTel).

CTC is certified as an Alternative Telecommunications Utility in Wisconsin and operates as a competitive local exchange carrier (CLEC). In addition to the services it provides in Chetek, CTC provides wireline local exchange service at Rice Lake and Barron, where it has previously been given ETC status. On February 28, 2003, the Commission issued a Notice of Investigation requesting comments on the CTC application. Only one party, CenturyTel, filed comments. In response to those comments, CTC provided additional information to the Commission staff. The Commission considered the issues raised at its open meeting of February 26, 2004.

MAR 23 2004

### **Findings of Fact**

1. CTC is certified as a competitive local exchange carrier (CLEC) in Wisconsin, and is providing facilities-based service in the exchanges of Barron, Rice Lake, and Chetek.
2. CTC is designated as an ETC in the Barron and Rice Lake exchanges, and has been fulfilling the requirements of an ETC, under both state and federal rules, since 1997.
3. CTC has committed to providing service to all requesting customers, and to advertise the availability of its service, throughout the Chetek exchange.
4. CTC has committed to providing service which meets both the federal requirements for ETCs and the state requirements set forth in Wis. Admin. Code § PSC 160.13, including the essential service definition set forth in Wis. Admin. Code § PSC 160.03.
5. As evidenced by reimbursement records from the state's universal service fund administrator, CTC is providing Lifeline service to customers in the Barron and Rice Lake area.
6. Nothing indicates that CTC has entered the Chetek exchange in an effort to obtain high-level subsidies for serving a low-cost area. CenturyTel serves exchanges which are both significantly more dense (and thus less costly to serve) and significantly less dense (and thus more costly to serve) than the Chetek exchange. From the evidence, it appears that CTC chose to enter the Chetek because it was adjacent to the areas in which CTC was already offering service.
7. The Chetek exchange is not contiguous with any other exchange in CenturyTel's service territory.

### **Conclusions of Law**

1. The Commission has jurisdiction and authority under Wis. Stat. §§ 196.02, 196.218 and 196.395; Wis. Admin. Code ch. PSC 160; 47 U.S.C. §§ 214 and 254; and other pertinent provisions of the Telecommunications Act of 1996, to make the above Findings of Fact and to issue this Order.

2. Even if “notice and opportunity for hearing” as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to the current ETCs in the rural areas at issue on any other basis, the Notice Requesting Comments, dated September 12, 2003, satisfies this requirement.

3. Neither federal law nor state law create a substantial, or property, interest in exclusive ETC status for incumbent rural ETCs.

### **Opinion**

ETC status was created by the Federal Communications Commission (FCC), and codified in 47 U.S.C. § 214(e)(2). Under FCC rules, the state commissions are required to designate providers as ETCs. 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(b). Designation as an ETC is required if a provider is to receive federal universal service funding. ETC designation is also required to receive funding from some, but not all, state universal service programs.

The FCC established a set of minimum criteria that all ETCs must meet. These are codified in the federal rules. 47 U.S.C. § 214(e)(1), 47 C.F.R. § 54.101(a). The 1996 Telecommunications Act states that “States may adopt regulations not inconsistent with the Commission’s rules to preserve and advance universal service.” 47 U.S.C § 254(f). A court upheld the states’ right to impose additional conditions on ETCs in *Texas Office of Public Utility*

*Counsel v. FCC*, 183 F.3d 393, 418 (5<sup>th</sup> Cir. 1999). While states must designate multiple ETCs if more than one provider meets the requirements and requests that status in a non-rural area, it must determine that it is in the public interest before designating more than one ETC in a rural area. 47 C.F.R. § 54.201. The Commission has already designated one ETC in each rural area.

The ETC designation of CTC into the Chetek exchange will provide additional competition in that exchange, and will provide benefits including customer choice, downward pressure on prices, and additional infrastructure development. As a result, the granting of ETC status in this case meets the requirements of Wis. Stats. § 196.03(6) and is in the public interest.

CTC has been providing service as an ETC in neighboring exchanges for many years. In that time, it has fulfilled the state and federal rules for essential service provision and ETC status. CTC has committed to meeting all of these state and federal rules in the Chetek exchange. It is, therefore, reasonable to approve the application for ETC designation by CTC for the Chetek exchange, subject to the condition specified later in this order.

The Commission is cognizant that authorizing additional ETCs can put pressure on the federal USF. However, the Commission believes that, since CTC is entering a rural area and has committed to all universal service goals set by this Commission for such entry, designating CTC as an ETC, and allowing it to draw state and federal USF dollars will mean that the USF dollars will be spent exactly as intended – in this case to promote competition and infrastructure deployment in rural areas.

CTC has asked for ETC designation in part of CenturyTel's territory. CenturyTel is a rural telephone company. Wis. Admin. Code § 160.13(2) provides that if the ILEC is a rural telephone company the ETC designation area is generally the entire territory (study area) of that

rural company. A smaller designation area is prohibited unless the Commission designates and the FCC approves a smaller area. 47 C.F.R. § 54.207(b). The Commission conditionally grants CTC ETC status in the Chetek exchange. However, CTC must apply to the FCC for approval of the use of a smaller area in such a designation. 47 C.F.R. § 54.207(c)(1). If the FCC approves use of the smaller area, then CTC's ETC status for the smaller area becomes effective. If the FCC does not approve use of the smaller area, then CTC's conditional ETC status for such an area is void. In such a case, if CTC determines that it then wants to apply for ETC status in the entire territory of the rural company, it may submit a new application requesting such designation.

The Commission grants this conditional status after having considered the changing market and the reason why the limitations on ETC designation in rural areas was created. Originally there were concerns about "cherry picking" or "cream skimming." At that time the USF support was averaged across all lines served by a provider within its study area. The per line support was the same throughout the study area. The concern was that competitive companies might ask for ETC designation in the parts of a rural company's territory that cost less to serve. It could thereby receive the averaged federal high cost assistance while only serving the low cost areas of the territory, while the ILEC received federal high cost assistance but had to serve the entire territory, including the high cost areas. *Report and Order in the Matter of Federal-State Joint Board on Universal Service*, FCC 97-157 (released 5/8/97) par. 189 (First Report and Order). As a result, the FCC found that, unless otherwise approved by both the state and the FCC, a competitor seeking ETC status in the territory of a rural company must commit to serving the entire territory. (First Report and Order, par. 189.)

However, since that time the USF funding mechanisms have changed. Currently, a competitive ETC gets the same amount of federal high cost assistance per line as the ILEC. An ILEC has the option to target the federal high cost assistance it receives so that it receives more USF money per line in the parts of the territory where it costs more to provide service, and less federal USF money in the parts of the territory where it costs less to provide service. *In the Matter of Multi-Association Group (MAG) Plan*, FCC 01-157 (released 5/23/01), par. 147. (MAG Order.) Since the competitive ETC receives the same per line amount as the ILEC, if it chooses to only serve the lower cost parts of the territory then it receives only the lower amount of federal USF money. As a result, as recognized by the FCC, the concerns about “cherry - picking” and “cream skimming” are largely moot. *In the Matter of Reconsideration of Western Wireless Corporation's Designation as an Eligible Telecommunications Carrier in the State of Wyoming*, FCC 01-311 (released 10/16/01), par. 12.

In the MAG Order, rural telephone companies were given the opportunity to choose a disaggregation and targeting method or to not disaggregate and target USF support. (MAG Order, pars. 147-154.) Companies were allowed to choose one of three targeting paths. CenturyTel has not taken advantage of the opportunity to target its USF assistance. However, if a competitive ETC is named in all or part of the service territory of a rural company, that company may ask the Commission to allow it to choose another Path. The FCC believed that state involvement in path changes gave competitors some certainty as to the amount of per line support available while preventing a rural company from choosing or moving to a different path for anti-competitive reasons. (MAG Order, par. 153.)

Further, nothing indicates that CTC is requesting ETC status in the Chetek exchange in an effort to obtain high-level subsidies for serving a low-cost area. Annual report data filed with the Commission shows that CenturyTel serves exchanges that are both significantly more dense (and thus less costly to serve) and significantly less dense (and thus more costly to serve.) From the evidence, it appears that CTC chose to enter the Chetek exchange because it was adjacent to the areas in which it was already offering service. Additionally, contiguousness is factor the FCC has addressed when discussing ETC designations for parts of rural service territories. The FCC has encouraged states to consider designating rural ETC service areas that consist only of the contiguous portions of the ILEC's service territory. (First Report and Order, par. 189.) The Chetek exchange is completely noncontiguous with any other exchange in CenturyTel's service territory.

### **Requests for Hearing**

CenturyTel argues that a hearing is required in this case. It argues that the reference to Wis. Stat. § 196.50 in Wis. Admin. Code § PSC 160.13(3) requires that a public hearing be held before an ETC designation may be made. It also argues that it has a protected property interest in its exclusive ETC status and that it has a constitutional right to a hearing before being deprived of this interest.

The Commission finds that the question of a statutory right to a hearing is moot since, even if "notice and opportunity for hearing" as provided by Wis. Stat. § 196.50(2)(f) is applicable in this case, or if process is due to CenturyTel on any other basis, the Notice of Investigation and request for comments issued on February 28, 2003 satisfies this requirement.



Further, federal law and state law do not create a substantial, or property, interest in exclusive ETC status for incumbent rural ETCs. [*Alenco Communications v. FCC*, 201 F.3d 608 (2000) (“The purpose of universal service is to benefit the customer, not the carrier.”); *WITA v. WUTA*, 65 P.3d 319 (2003); “*In re Application of GCC License Corp.*, 647 N.W.2d 45, 52, 264 Neb. 167, 177 (2002)”; *PSC v. Arlington Telephone Co.* 65 P.3d 319 (2003). (“[r]ather, customers’ interest, not competitors’, should control agencies’ decisions affecting universal service” and that “[t]he Telecommunications Act does not mention protecting the private interests of incumbent rural carriers, who are often exclusive ETCs simply by default as the sole service provider operating in a particular area.”)]. *See also*, *State ex rel. 1<sup>st</sup> Nat. Bank v. M&I Peoples Bank*, 95 Wis. 2d 303, 311 (1980). (Economic injury as the result of lawful competition does not confer standing.); *MCI Telecommunications v. Pub. Serv. Comm.*, 164 Wis. 2d 489, 496, 476 N.W.2d 575 (Ct. App. 1991); and *Wisconsin Power & Light v. PSC*, 45 Wis. 2d 253 (1969) (“... the predominant purpose underlying the public utilities law is the protection of the consuming public rather than the competing utilities.”)

### Order

1. This order is effective on issuance.
2. CTC is granted ETC status in the Chetek exchange, conditioned upon the FCC approving the use of an area smaller than CenturyTel’s entire territory. Subject to this FCC approval, CTC is an ETC in the Chetek exchange within the meaning of 47 U.S.C. § 214(c) and Wis. Admin. Code § PSC 160.13, and is eligible to receive funding pursuant to 47 U.S.C. § 254(2). This order constitutes the certification to this effect by the Commission.

Docket 1455-TI-101

3. If the FCC does not approve CTC's petition to use an area smaller than CenturyTel's entire territory, then the conditional grant and certification of ETC status in this order are void.

4. Jurisdiction is retained.

Dated at Madison, Wisconsin, March 18, 2004

By the Commission:

  
\_\_\_\_\_  
Lynda L. Dorr  
Secretary to the Commission

LLD: GAE: PRJ:slg:clf:g:\order\pending\1455-TI-101 CTC as ETC order

See attached Notice of Appeal Rights

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in Wis. Stat. § 227.53. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in Wis. Stat. § 227.01(3), a person aggrieved by the order has the further right to file one petition for rehearing as provided in Wis. Stat. § 227.49. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with Wis. Stat. § 227.48(2), and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 9/28/98

## **APPENDIX B**



## Wisconsin Exchange Area Boundaries





## **APPENDIX C**



ORIGINAL

Incumbent Local Exchange Carrier Annual Reports (LEC)

Service Data by Exchange - End Of Year

Search Criteria ...

Report Generated: 3/29/2004 3:55:18 PM

Utility: CENTURYTEL OF THE MIDWEST- WISCONSIN, LLC

Year: 2002

Caveats:



Export  
Instructions

New Search

Total Records: 51	Year	Utility ID	Utility Name	Exchange ID	Exchange Name	Total Bus Lines	Total Res Lines	Total Bus/Res Lines	Total Lines Used	Exch Sq Mi	Exch Route Mi
	2002	4260	CENTURYTEL OF THE MIDWEST-WISCONSIN, LLC.	0100	AMBERG	73	677	750	770	175	85
				0260	AVOCA	55	450	505	520	48	74
				0640	BOSCOBEL	734	1,758	2,492	2,557	91	182
				0680	BOYD	94	633	727	739	70	100
				0850	CADOTT	353	1,353	1,706	1,729	108	180
				0940	CASCO	177	1,175	1,352	1,399	80	166
				1050	CHETEK	406	1,611	2,017	2,063	237	166
				1200	COLEMAN	568	2,458	3,026	3,054	166	250
				1310	CRIVITZ	640	2,253	2,893	2,934	153	160
				1340	CUMBERLAND	710	3,562	4,272	4,306	237	348
				1430	DEFOREST	1,993	5,617	7,610	7,720	74	238
				1440	DELAFIELD	1,907	3,827	5,734	5,760	17	132
				1520	DOUSMAN	515	2,854	3,369	3,407	48	143
				1570	EAGLE	464	2,160	2,624	2,651	37	130
				1620	EAST TROY	1,404	4,123	5,527	5,576	89	233
				1780	ELROY	536	1,227	1,763	1,781	194	156
				1900	FOOTVILLE	163	793	956	983	51	90
				1970	FREMONT	242	1,076	1,318	1,336	55	67
				2000	GENESEE	885	3,905	4,790	4,824	37	190
				2100	GOODMAN	173	966	1,139	1,156	266	140
				2250	HARMONY	84	957	1,041	1,059	96	160
				2320	HAZEL GREEN	110	568	678	698	20	33
				2350	HIGHLAND	150	592	742	758	91	104
				2920	LENA	203	908	1,111	1,122	96	119
				3410	MILTON	945	4,745	5,690	5,776	80	188
				3590	MOUNT ZION	27	355	382	399	80	133
				3600	MUKWONAGO	1,993	5,410	7,403	7,436	37	165
				3720	NESHKORO	143	1,464	1,607	1,632	106	162
				3880	NORTH PRAIRIE	326	2,276	2,602	2,751	14	104
				4080	PALMYRA	419	2,343	2,762	2,796	88	173
				4130	PEMBINE	325	1,477	1,802	1,827	207	221
				4250	PLATTEVILLE	4,144	4,777	8,921	9,052	150	353
				4360	POYNETTE	721	2,958	3,679	3,743	99	229
				4370	POYSIPPI	101	872	973	990	76	83

			4630	RIPON	2,747	4,462	7,209	7,336	122	245
			4760	SARONA	38	391	429	434	43	98
			4870	SHELL LAKE	466	1,781	2,247	2,269	172	300
			5030	SPOONER	1,566	4,693	6,259	6,322	266	523
			5130	STEUBEN	14	223	237	249	91	71
			5240	SULLIVAN	294	2,078	2,372	2,406	70	158
			5320	THORP	479	1,807	2,286	2,330	207	291
			5360	TOMAH	3,187	5,917	9,104	9,252	174	413
			5420	TURTLE LAKE	489	1,248	1,737	1,768	60	174
			5430	TWIN BRIDGE	148	1,798	1,946	1,965	187	243
			5580	WARRENS	220	1,027	1,247	1,272	194	214
			5710	WAUSAUKEE	284	1,438	1,722	1,774	158	219
			5740	WAYSIDE	241	1,458	1,699	1,735	92	190
			5810	WEYAUWEGA	563	1,901	2,464	2,526	109	142
			5890	WILD ROSE	293	1,729	2,022	2,064	77	181
			6000	WONEWOC	116	812	928	942	56	106
				TOTAL	32,928	104,943	137,871	139,948	5,551	9,025

138,859